Before the Federal Communications Commission Washington, D.C. 20554

In the Matter of

Number Resource Optimization	§	CC Docket No. 99-200
	§	
Implementation of the Local Competition	§	CC Docket No. 99-98
Provisions of the Telecommunications Act	§	
of 1996	§	
	§	
Telephone Number Portability	§	CC Docket No. 95-116
	8	

COMMENTS OF TEXAS STATEWIDE TELEPHONE COOPERATIVE, INC.

Texas Statewide Telephone Cooperative, Inc. (TSTCI) hereby files these comments in the above-captioned proceeding. TSTCI is an association representing 19 telephone cooperatives and 16 commercial companies (please see Attachment I). All TSTCI member companies are regulated by the Public Utility Commission of Texas.

TSTCI is filing this letter to indicate its support of the responses filed by the National Telecommunications Cooperative Association (NTCA) in this project. TSTCI concurs with NTCA's request to the Commission to exempt all rural incumbent local exchange carriers (ILECs) with switches in the top 100 Metropolitan Statistical Areas (MSAs) from local number portability (LNP) and thousand block number pooling until the ILEC receives a request for LNP from a competing carrier. If required to implement LNP before requested to do so, rural ILECs may see an increase in their cost of service to rural customers.

In the interest of not unnecessarily burdening the record in this project, TSTCI is simply indicating its concurrence and support of the responses filed by NTCA.

Respectfully submitted,

TEXAS STATEWIDE TELEPHONE COOPERATIVE, INC.

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Austin, Texas 78731

Cammie Hughes

Member Services Director

TEXAS STATEWIDE TELEPHONE COOPERATIVE, INC.

Brazos Telecommunications, Inc.

Brazos Telephone Coop., Inc.

Cameron Telephone Company

Cap Rock Telephone Coop., Inc.

Central Texas Telephone Coop., Inc.

Coleman County Telephone Coop., Inc.

Colorado Valley Telephone Coop., Inc.

Comanche County Telephone Company, Inc.

Community Telephone Company, Inc.

Cumby Telephone Coop., Inc.

Dell Telephone Coop., Inc.

E.N.M.R. Plateau Communications, Inc.

Eastex Telephone Coop., Inc.

Electra Telephone Company

Etex Telephone Coop., Inc.

Five Area Telephone Coop., Inc.

Ganado Telephone Company, Inc.

La Ward Telephone Exchange, Inc.

Lake Livingston Telephone Company

Lipan Telephone Company

Livingston Telephone Company

Mid-Plains Rural Telephone Coop., Inc.

Nortex Communications, Inc.

North Texas Telephone Company

Panhandle Telephone Coop., Inc.

Peoples Telephone Coop., Inc.

Riviera Telephone Company, Inc.

Santa Rosa Telephone Coop., Inc.

South Plains Telephone Coop., Inc.

Tatum Telephone Company

Taylor Telephone Coop., Inc.

Wes-Tex Telephone Coop., Inc.

West Plains Telecommunications, Inc.

West Texas Rural Tel. Coop., Inc.

XIT Rural Telephone Coop., Inc.